

IN THE NORTHERN DISTRICT OF OKLAHOMA
UNITED STATES OF AMERICA

(1) PHILIP SANDERS, an
Individual and Husband and
Next of Kin of BRENDA JEAN
SANDERS, Deceased,

Plaintiff,

-vs-

No. 17-cv-492-JHP-FHM

(1) CREEK COUNTY BOARD OF
COUNTY COMMISSIONERS, and
(2) SHERIFF BRET BOWLING,
in his official capacity as
Creek County Sheriff, and
(3) TURN KEY HEALTH CLINICS,
a limited liability company,

Defendants.

DEPOSITION OF NICHOLAS GROOM

TAKEN ON BEHALF OF THE PLAINTIFF

TAKEN AT 7447 SOUTH LEWIS AVENUE

TULSA, OKLAHOMA

MAY 6, 2020

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REPORTED BY: RACHAEL A. ROPER, RPR

ROPER REPORTING  
P.O. BOX 1289  
BROKEN ARROW, OKLAHOMA 74013  
Roperreporting@att.net  
(918) 633-7258

**EXHIBIT**

**8**

1 both LPNs.

2 Q. Cheryl Green and who?

3 A. Kerri, K-e-r-r-i, and I believe the last name is  
4 F-e-r-r-i-s.

5 Q. Who trained you when you started working at Creek  
6 County?

7 A. Deborah.

8 Q. Walk us through what that training was.

9 A. She just showed me the medication pass. Of course,  
10 we all review the policies and procedures, you know,  
11 of how we do the medication pass; we go around and  
12 everyone come to the cell door or we go to the  
13 segregation cells independently; how to do the nurse  
14 protocols; be able to give short-time medication or  
15 treat people based on those protocols; how to call a  
16 provider; and then just various paperwork, forms to  
17 submit, things like that. How to order supplies,  
18 how to order medication.

19 Q. How long was Deborah on site during this training?

20 A. I believe the first few days I think she was there  
21 with me the whole day. This is four years ago, I  
22 mean, I can't remember exactly how long she was  
23 there or all that.

24 Q. Did you do anything to prepare for your depo today?

25 A. Just other than meeting with my attorney.

1       picking up the phone and calling Indian Health  
2       clinic the day that you met with Brenda?

3               MS. THOMPSON: Object to form; asked and  
4       answered four times.

5   Q.   (By Mr. Richardson) Go ahead, please.

6               MS. THOMPSON: Answer it again.

7   A.   Yes.

8   Q.   (By Mr. Richardson) What were you wearing that  
9       day?

10              MS. THOMPSON: Object to form.

11   A.   I was wearing my scrubs.

12   Q.   (By Mr. Richardson) Were you required to wear  
13       scrubs?

14   A.   Yes.

15   Q.   And what color were the scrubs you were wearing  
16       that day?

17              MS. THOMPSON: Object to form.

18   A.   I could not remember the color of my scrubs four  
19       years ago on a specific day.

20   Q.   (By Mr. Richardson) Do you remember the phone  
21       number of the Indian Health clinic?

22   A.   No, it would be something I'd have to look up.

23   Q.   Would you have had to have looked it up that day?

24   A.   I probably had it on a list next to the phone.

25   Q.   Do you know if you had it on a list next to the

1 to her as a doctor; correct?

2 A. Okay.

3 Q. All right. So why are you so shocked by it then if  
4 that happens?

5 A. Well, because she came to the -- let's see. On the  
6 18th she came out and said she had dry eyes and she  
7 had a little redness in her eyes and a little blurry  
8 vision, so if she was with her enough and was able  
9 to report something as minor as that, I would think  
10 somewhere she would tell us about diarrhea for two  
11 weeks.

12 MR. RICHARDSON: I'd ask that be stricken as  
13 nonresponsive.

14 Q. (By Mr. Richardson) I'm asking why you would be so  
15 surprised on what I read you and what you anchored  
16 in on was RN when --

17 A. Well, yeah, that could be they mistook that, so  
18 that's fine.

19 Q. I mean --

20 A. Why I was surprised about it is what I just told  
21 you.

22 Q. Sir, there is not another question yet.

23 The other thing is, is you-all are all wearing  
24 scrubs when you work; correct?

25 A. Yes.